

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

**SECURITIES AND EXCHANGE
COMMISSION,**

Plaintiff,

-against-

**RICHARD XIA, a/k/a YI XIA; and
FLEET NEW YORK METROPOLITAN
REGIONAL CENTER, LLC, f/k/a FEDERAL
NEW YORK METROPOLITAN REGIONAL
CENTER, LLC;**

Defendants,

-and-

**JULIA YUE, a/k/a JIQING YUE;
XI VERFENSTEIN; and XINMING YU,**

Relief Defendants.

21-cv-5350-PKC-RER

**STIPULATION AND
[PROPOSED] ORDER**

The parties, through their undersigned attorneys and subject to the Court's approval, hereby stipulate and agree to the following:

1. On June 7, 2022, the Court entered a Scheduling Order, DE 147, which, among other things, established November 18, 2022, as the deadline for the parties to complete fact discovery.

2. The parties, having conferred on the schedule in the Scheduling Order, consent to the following extension of deadlines in the Scheduling Order:

- a. The parties shall complete all fact discovery by February 6, 2023.
- b. The parties shall make opening expert disclosures, pursuant to Federal Rule of Civil Procedure 26(a)(2), by March 6, 2023.

- c. The parties shall make rebuttal expert disclosures, pursuant to Federal Rule of Civil Procedure 26(a)(2), by March 27, 2023.
 - d. The parties shall complete expert discovery by April 24, 2023.
 - e. Any *Daubert* motions or motions for summary judgment shall be filed by May 22, 2023.
 - f. Oppositions to any *Daubert* motions or motions for summary judgment shall be filed by June 12, 2023.
 - g. Replies in support of any *Daubert* motions or motions for summary judgment shall be filed by June 26, 2023.
3. The extension is needed to permit the parties sufficient time to complete the necessary discovery.
4. No previous extensions to the Scheduling Order have been requested or granted.

Respectfully submitted,

SECURITIES AND EXCHANGE
COMMISSION

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With good cause appearing for the entry of an Order extending the discovery deadlines as set forth above,

IT IS on this ____ of _____ 2022

SO ORDERED:

DATED: Brooklyn, New York
_____, 2022

RAMON E. REYES, JR.
United States Magistrate Judge